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May 22, 2023

VIA ECF AND ELECTRONIC MAIL

Special Master the Honorable Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower
18th Floor
Philadelphia, PA 19103

Re: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation
Case No. 1:19-md-02875-RBK-JS

Dear Special Master Vanaskie:

This letter constitutes the parties' joint status report following our appearance before the Special Master on Wednesday, May 17. Plaintiffs' counsel has reviewed this letter and consents to its submission. In accordance with the Special Master's instructions, the parties held a meet-and-confer on Friday, May 19, 2023, to address Defendants' requests for certain reports and datasets from MSP Recovery Claims, Series LLC ("MSPRC"), which Defendants argued should be produced under Special Master Order No. 73 and which Plaintiffs disputed were subject to production. During the meet-and-confer, Defendants proposed a compromise involving the production of certain of the disputed reports and datasets. MSPRC's counsel has been evaluating that proposal. The parties are planning to meet and confer again on Tuesday, May 23.

The parties will continue to pursue a compromise resolution of this dispute, and request that the Special Master set a follow-up conference to address any unresolved issues for Thursday, May 25, 2023, after 2:00 pm EDT, if that date and time is convenient to the Special Master. If the



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parties resolve their dispute in full, they will notify the Special Master and cancel the follow-up conference.

Respectfully submitted,

/s/ Gregory E. Ostfeld

Gregory E. Ostfeld

cc: Adam Slater, Esq. (*via email, for distribution to Plaintiffs' Counsel*)
Jessica D. Miller, Esq. (*via email, for distribution to Defendants' Counsel*)
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